



**Subject: Response to Wireline Competition Bureau's (Bureau) Public Notice seeking comment on areas shown as unserved on the National Broadband Map for Connect America Phase I and published list of potentially unserved census blocks in price cap areas.**

**Comment: Q-Wireless, LLC Broadband Coverage in the Commonwealth of Kentucky as shown on the National Broadband Map (dated 12/31/2011, Round 5) is not representative of actual coverage. This comment corrects that coverage area to coincide with the existing Kentucky Broadband Map (June 30, 2012, Round 6) and submitted updates to be published (June 30, 2013, Round 7).**

**WC Docket No. 10-90**

Federal Communications Commission  
Office of the Secretary  
445 12th St., S.W.,  
Washington, D.C. 20554

January 9, 2013

**Dear Secretary,**

Q-Wireless, LLC (QWL) operates wireless networks providing broadband in i) Union, McLean, Webster, Henderson, Daviess, Ohio and Hancock counties in Kentucky (CGI Network), ii) Daviess County, Kentucky (OOLW Network) and iii) a newly-acquired network in Lyon and Caldwell counties, Kentucky (QKY Network). All of these networks have the capability and capacity to provide Tier 5 ( $\Rightarrow$ 3Mbps) download speeds and Tier 3 upload speeds ( $\Rightarrow$ 768Kbps).

**Background:** QWL has been working with Michael Baker Junior, Inc. (Baker) the broadband mapping contractor for the Commonwealth of Kentucky (KY) to correctly reflect the QWL coverage area. At the Round 5 deadline, QWL had provided only partial data to Baker such that the KY broadband map and subsequent NTIA map were not representative of the actual coverage area. For Round 6, QWL provided more complete data on our CGI network. For this data the RF studies produced by Baker and incorporated in the map are accurate but the speed Tiers were not listed as Tier 5 down and Tier 3 up speeds, due to differences in state and federal guidelines. For our QKY network, which was being acquired at the Round 6 deadline, no data had yet been provided to Baker for Round 6, so these are not reflected on the National Broadband Map.



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QWL has submitted and Baker has accepted, on behalf of KY, new data to be incorporated on the Kentucky Broadband Map and for Round 7 data.

**CGI Network Update:** This update reflects Tier 5 download and Tier 3 upload speeds for our CGI network. Census blocks previously listed on the National Broadband Map as unserved or partially unserved that are now served are shown through attachments. Please see attached, a shape file for Round 6 ([QWL Round 6 Blocks served.pdf](#)) showing the actual coverage as produced by Baker, a shape file for Round 5 disputed census blocks ([QWL CAF Phase 1 Blocks disputed.pdf](#)) and the corresponding 15-digit census block list ([QWL CAF Phase 1 disputed Census Blocks.pdf](#)) the 15-digit census block IDs that are served by QWL.

**QKY Networks Updates:** This update reflects the coverage area not displayed in previous rounds and where QWL provides Tier 5 download and Tier 3 upload speeds. This data has been submitted and accepted by Baker but not yet characterized until the Round 7 update. We have instead attached Census Blocks that based on our RF studies we project will also be covered by Baker RF studies ([QKY Projected Census\\_Blocks.pdf](#))

#### **Conclusion:**

If you have any questions, you can contact Wendall McCarty at Michael Baker Junior, Inc. or me @ 812-759-7905. Please protect our independent business from being overbuilt with Connect America Funds.

Regards,

A handwritten signature in black ink that reads 'Phil Lambert'.

Phil Lambert  
General Manager  
Q-Wireless, LLC



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